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*Proposed Counsel to the Official Committee
of Unsecured Creditors of Rudolph W. Giuliani*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	:
RUDOLPH W. GIULIANI	: Case No. 23-12055 (SHL)
a/k/a RUDOLPH WILLIAM GIULIANI,	:
	:
Debtor.	:
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**VERIFIED STATEMENT OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
RUDOLPH W. GIULIANI PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 case of Rudolph W. Giuliani (the “Debtor”) hereby submits this verified statement (this “Verified Statement”), and in support thereof states as follows.

1. On December 21, 2023, the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (this “Court”). The Debtor has continued

in possession of his property and is managing his business affairs as a debtor and debtor in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No request for the appointment of a trustee or examiner has been made in this chapter 11 case.

2. On January 12, 2024, pursuant to Bankruptcy Code section 1102, the United States Trustee for the Southern District of New York appointed three of the Debtor's unsecured creditors to serve as members of the Committee.¹ The Committee currently comprises the following members: (i) US Dominion, Inc., (ii) Ms. Noelle Dunphy and (iii) Ms. Wandrea' ArShaye "Shaye" Moss.

3. On January 16, 2024, the Committee selected Akin Gump Strauss Hauer & Feld LLP ("Akin") as its proposed counsel.²

4. In accordance with Bankruptcy Rule 2019, attached hereto as **Exhibit A** is a list of the names and addresses of, and the nature and amount of all disclosable economic interests held by, each Committee member in relation to the Debtor. The claims and claim amounts set forth on **Exhibit A** have been provided by the applicable Committee members. By filing this Verified Statement, neither the Committee nor its counsel makes any representation with respect to the amount, allowance, validity, secured status or priority of such claims and each reserves all rights with respect thereto.

¹ See *Notice of Appointment of Official Committee of Unsecured Creditors*, dated January 12, 2024 [Docket No. 46].

² As will be set forth in Akin's retention application and subject to approval of this Court, in recognition of the unique and important circumstances of this chapter 11 case, Akin has agreed to serve as counsel to the Committee on a *pro bono* basis, with one contingent qualification: Akin intends to reserve the right to seek allowance, under applicable provisions of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and orders of this Court, of all actual, reasonable and necessary fees and expenses incurred in connection with its representation of the Committee in the event that the Debtor obtains confirmation of a chapter 11 plan or other resolution of the chapter 11 case that is not supported by the Committee. In that event, it is Akin's intention that all of Akin's fees and expenses approved by the Court and paid by the Debtor's estate to Akin in connection with its engagement by the Committee be contributed to the Debtor's unsecured creditors.

5. Nothing contained in this Verified Statement (or **Exhibit A** hereto) should be construed as a limitation upon or waiver of any Committee member's rights to assert, file and/or amend its claim(s) in accordance with applicable law and any orders entered in the Debtor's chapter 11 case establishing procedures for filing proofs of claim.

6. The Committee reserves the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

Dated: February 2, 2024
New York, New York

/s/ Ira S. Dizengoff

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*Proposed Counsel to the Official Committee
of Unsecured Creditors of Rudolph W. Giuliani*

EXHIBIT A

Name	Address	Nature and Amount of Disclosable Economic Interests ¹
US Dominion, Inc.	410 17th St. Suite 850 Denver, CO 80202 Attn.: Lindsey Kurtz, General Counsel	Plaintiff in <i>US Dominion, Inc., et al. v. Giuliani</i> , No. 1:21-cv-00213-CJN, in the United States District Court for the District of Columbia, alleging defamation <i>per se</i> and compensatory damages in the amount of not less than \$651,735,000 and punitive damages in the amount of not less than \$651,735,000.
Ms. Noelle Dunphy	c/o Justin Kelton, Esq. Abrams Fensterman LLP 1 Metrotech Center Suite 1701 Brooklyn, NY 11201	Plaintiff in <i>Dunphy vs. Giuliani, et al.</i> , Index No. 650033 / 2023, in the New York Supreme Court, alleging claims in an amount of not less than \$10,000,000 for crime of violence motivated by gender under the New York City Victims of Gender-Motivated Violence Protection Act; battery; assault; gender discrimination and sexual harassment under the New York State Human Rights Law; hostile work environment animated by discrimination under the New York State Human Rights Law; retaliatory discharge under the New York State Human Rights Law; aiding and abetting sexual harassment and gender discrimination under the New York State Human Rights Law; sexual harassment and gender discrimination against a contractor or consultant under the New York State Human Rights Law; gender discrimination and sexual harassment under the New York City Human Rights Law; hostile work environment animated by discrimination under the New York City Human Rights Law; retaliatory discharge under the New York City Human Rights Law; aiding and abetting gender discrimination and sexual harassment under the New York City Human Rights Law; sexual harassment and gender discrimination relating to freelancers and contractors under the New York City Human Rights Law; breach of contract; violation of New York Labor Law – Minimum Wage; violation of New York Labor Law – Overtime; violation of New York Labor Law for Failure to Provide Notice and Acknowledgment of Wage Rate; violation of New York Labor Law for Failure to Provide Wage Statements; unjust enrichment; quantum meruit; violation of the Freelance Isn't Free Act; and breach of fiduciary duty.

¹ To the best of counsel's knowledge, the information included herein is accurate as of the date hereof.

Name	Address	Nature and Amount of Disclosable Economic Interests ¹
Ms. Wandrea' ArShaye "Shaye" Moss	c/o Von A. Dubose, Esq. Dubose & Miller 75 14th Street NE Atlanta, GA 30309	<p>One of two plaintiffs in <i>Freeman et al. v. Giuliani</i>, No. 1:21-cv-03354-BAH, in the United States District Court for the District of Columbia, alleging defamation <i>per se</i>, intentional infliction of emotional distress and civil conspiracy.</p> <p>On December 18, 2023, the United States District Court for the District of Columbia entered a judgment against the Debtor in the amount of \$145,969,000.00, plus post-judgment interest. In addition, Ms. Moss and Ms. Freeman (the other plaintiff) were awarded \$237,113.00 in attorneys' fees, plus post-judgment interest.</p>